

IN RE:  
JORGE DIAZ ROSA  
XXX-XX-8484

DEBTOR (S)

CASE NO. 11-09964-ESL

CHAPTER 13

TRUSTEE'S OBJECTION TO CLAIM #02-1  
FILED BY (OR ON BEHALF OF) :ORIENTAL MORTGAGE

TO THE HONORABLE COURT:

The Trustee objects to Claim #02-1, filed on March 27, 2012 for the amount of \$35,000.00, classified as SECURED on the following grounds:

- Failure to comply with BR 3001(c), no written evidence of the claimed debt was filed with the proof of claim.
- Failure to comply with BR 3001(d), no evidence of perfection of claimed security interest was filed with the proof of claim.

WHEREFORE the Trustee respectfully prays that this motion be granted for the reason herein set forth and that an order be entered:

Disallowing objected Claim.

30 DAY NOTICE AND CERTIFICATE OF SERVICE: Pursuant to BR 3007 the Chapter 13 Trustee certifies that a copy of this motion has been served by regular US Mail on this same date to: the Debtor(s), his/her/their attorney the objected claimant and its counsel of record (if any) and are hereby notified that unless an opposition to this motion is submitted in writing within 30 days from the date appearing in the certificate of service, infra, the Court may grant this motion without the need of an actual hearing. (See attached Verified Statement)

In San Juan, Puerto Rico this Wednesday, April 4, 2012.

/s/ Jose R. Carrion

JOSE R. CARRION

CHAPTER 13 TRUSTEE

PO Box 9023884, Old San Juan Stat.

San Juan, PR 00902-3884

Tel. (787) 977-3535

Fax (787) 977-3550

VERIFIED STATEMENT

The undersigned, of legal age and as employee of Jose R. Carrion, Chapter 13 Trustee Office, hereby certifies that on this same date, I personally and duly notified a true and exact copy of the attached motion to each party below listed.

JORGE DIAZ ROSA  
31 CALLE ALGARIN  
JUNCOS, PR 00777

ORIENTAL MORTGAGE  
CUPEY CENTER ROAD  
SAN JUAN, PR 00925

ROBERTO FIGUEROA CARRASQUILL\*  
PO BOX 193677  
SAN JUAN, PR 00919-3677

In San Juan, Puerto Rico this Wednesday, April 4, 2012.

  
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Chapter 13 Clerk